

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TOMAS VALENTA,	)	
	)	
PLAINTIFF,	)	
	)	Civil Action No. 17-cv-06609
v.	)	
	)	Hon. Jorge Alonso
MIDLAND FUNDING, LLC, and MIDLAND	)	
CREDIT MANAGEMENT, INC.,	)	Magistrate Judge Mary M. Rowland
	)	
DEFENDANTS.	)	

**Initial Status Report**

I. The Nature of the Case

A. Attorneys of Record

**Plaintiff**

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**Defendants**

Brandon Stein  
David Schultz  
***Hinshaw & Culbertson LLP***  
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B. Jurisdiction and Venue

1. This Court has jurisdiction pursuant to § 1692k(d) of the FDCPA, and 28 U.S.C. § 1331, and pursuant to 28 U.S.C. § 1367 as to Plaintiff's state law claims. Venue is proper in this District because parts of the acts and transactions occurred here and Defendants transact substantial business here. Plaintiff, Tomas Valenta is a citizen and resident of Illinois. He resides in the Northern District of Illinois.

C. Claims Asserted In Complaint

2. Defendants failed to communicate a dispute to the Equifax credit reporting agency, in violation of 15 U.S.C. § 1692e(8), when they knew or should have known about the dispute and communicated other information regarding the alleged debt to Equifax.
3. Defendants disclosed information concerning the existence of a debt which they knew to be disputed without disclosing the fact that Plaintiff disputes the debt, in violation of 225 ILCS 425/9 of the ICAA.

D. Relief Sought

4. Plaintiff is seeking under The FDCPA:
  1. Actual damages pursuant to 15 U.S.C. § 1692k(a)(1);
  2. Statutory damages pursuant to 15 U.S.C. § 1692k(a)(2);
  3. Costs and reasonable attorney fees pursuant to 15 U.S.C. § 1692k(a)(3); and
  4. Such other or further relief as the Court deems proper.

E. Both parties have made a jury demand.

F. All parties have been served.

II. Discovery and Pending Motions

A. There are currently no motions pending before this Court.

B. Proposal For Discovery

1. The Discovery needed will be Requests for Productions, Requests to Admit, and Interrogatories; Defendants additionally anticipate taking Plaintiff's deposition.
2. Plaintiff will not need a protective order. Defendants will need a protective order for the production of documents during discovery and have provided Plaintiff with a proposed protective order based on the Northern District of Illinois' Model Order.
3. MIDP Responses will be due on November 13, 2017;
4. Fact Discovery will close on March 26, 2018;
5. The parties do not anticipate the need for expert discovery;

III. Settlement and Referrals

- A. Plaintiff has made a demand.
- B. The parties do not request a settlement conference at this time.
- C. The parties do not unanimously consent to proceed before a Magistrate Judge on all matters at this time.

Dated: October 26, 2017

Counsel for Plaintiff

s/Celetha Chatman

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s/Brandon S. Stein

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**CERTIFICATE OF SERVICE**

I, Celetha Chatman, an attorney, hereby certify that on October 31, 2017, I electronically filed the foregoing document using the CM/ECF system, which will send notification of such filing to all attorneys of record.

**Dated: October 31, 2017**

Respectfully submitted,

By: /s/ Celetha Chatman